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2	Nevada Bar No. 6883 WOODBURN AND WEDGE			
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6	Attorneys for Defendant			
7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA			
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9				
10	JOHN ILIESCU, JR., AND SONNIA			
11	ILIESCU, Trustees of The John Iliescu, Jr. and Sonnia Iliescu 1992 Family Trust	Case No.: 3:21-cv-00387-ART-CLB		
12	Agreement dated January 24, 1992,			
13	Plaintiffs,			
14	V.	RTC'S PRETRIAL DISCLOSURES PURSUANT		
15	THE REGIONAL TRANSPORTATION COMMISSION OF WASHOE COUNTY, a special unit of the government; and DOES I			
16				
	through X, inclusive,			
17	Defendants.			
18	Belefidants.			
19	Defendant, The Regional Transportation Commission of Washoe County ("RTC"), by			
20	and through its attorneys, Woodburn and Wedge, discloses the following documents and			
21	witnesses known to defendant as of this date pursuant to FRCP 26.			
22	A. LIST OF WITNESSES PURSUANT TO FRCP 26(a)(3)(A):			
23	1. Witnesses RTC expects to pres	sent:		
24	a. Jeffrey Wilbrecht			
25	c/o Woodburn and Wedg	ge		
	6100 Neil Road, #500 Reno, Nevada 89511			
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	1 / / /			

Woodburn and Wedge 6100 Neil Road, Suite 500 Reno, NV 89511 775-688-3000

1		2.	Witnesses RTC may call if the need arises:		
2			a. Scott Griffin		
3			6121 Lakeside Drive, Suite 160 Reno, Nevada 89511		
5		3.	Witnesses whose testimony is expected to be presented by means of deposition: None at this time.		
6	B.	LIST	ST OF DOCUMENTS PURSUANT TO FRCP 26(a)(3)(C):		
7		1. Documents RTC expects to offer:			
8			a. Photographs designated as RTC 00000 – 000006		
9			b. Photograph designated as Iliescu000449		
10		2.	Documents RTC may offer if the need arises:		
11			a. Correspondence designated as RTC 000015 - 000018		
12		DAT	ED: July 10, 2023		
13			WOODBURN AND WEDGE		
14			WOODBURN AND WEDGE		
15 16					
17			By <u>/s/ Dane W. Anderson</u> Dane W. Anderson, Esq.		
18			Nevada Bar No. 6883 Attorneys for Plaintiff		
19			The Regional Transportation Commission of Washoe County		
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1 **CERTIFICATE OF SERVICE** 2 I certify that I am an employee of WOODBURN AND WEDGE and that on this 3 4 date, pursuant to FRCP 5(b), I am serving a true and correct copy of the document 5 titled RTC'S PRETRIAL DISCLOSURES on the parties set forth below Email to: 6 Donald Lattin, Esq. Carolyn Renner, Esq. 7 MAUPIN, COX & LEGOY 4785 Caughlin Parkway 8 Reno, Nevada 89519 9 dlattin@mcllawfirm.com crenner@mcllawfirm.com 10 Attorneys for Plaintiffs 11 12 DATED: July 10, 2023. 13 14 /s/ Jennifer Heston Employee of Woodburn and Wedge 15 16 17 18 19 20 21 22 23 24 25 26 27 28

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